

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CHLOÉ, S.A.S., J. CHOO LIMITED

Plaintiffs,

CIVIL ACTION NO.:07 cv 6491(WHP)

vs.

KEN CHEN a/k/a SHU CHEN a/k/a XIANG
CHEN, DANIEL DOE, GODDESS
TRADING d/b/a
GODDESSTRADING@HOTMAIL.COM,
LUXUNG GOODS, LUXURY GOODS,
TERRY DOE d/b/a
AZNTERRY911@HOTMAIL.COM, JASON
DOE d/b/a JARRY326@YAHOO.COM.CN,
FASHION HANDBAGS, BENNY DOE a/k/a
YU LIN, JEANCARLO DOE, JOSEPH a/k/a
JOSE DOE a/k/a JOSE CHONG WEN, SISI
a/k/a CECI DOE, TOP LUXURY
HANDBAGS d/b/a
LUXURYHANDBAGS277@YAHOO.COM,
FRANCISCO DOE, BEN DOE, CARLOS
DOE a/k/a CARLOS RENE TSE SIO,
INSTYLE LUXURY HANDBAGS, LIN LIN
NAN a/k/a CORINA DOE a/k/a QIMIAO HU
a/k/a QI MIAO HU, KENNY DOE a/k/a YE
GUO a/k/a GUO Q YE, NEWCOME
TRADING d/b/a TOSCA, QUICK GLOBAL
SHIPPING, HOWARD EXPRESS
SHIPPING, RANDY DOE, JAE MAN YOO,
YAN HE XIA, WAI KIT WONG, CHEN LI
YU, CHEN X. JIANG, W. FEI ZENG,
CHENG CHEN, XIANXN CAI, FU
ALEJANDRO CHANG, WAI KIT LEW,
ENYI HUANG, YUE XU, SONG GAO,
LISA WU, JIMMY NG, TUAN PHAN, LING
CAI, LISA CHAN YAN FEN CHEN, P.S.K.
AMERICA, INC., HENG FA INC., CHEN
STAR GIFT SHOP, JOEY'S GIFT SHOP,
INC., CATSE CO., INC., SHEN XING GIFT
SHOP INC., NEW WEALTH TRADING,
INC. d/b/a TOSCA USA, TOSCA
HANDBAGS, NICE HANDBAGS, 265
CANAL BOOTH #16, 265 CANAL BOOTH
#5, 265 CANAL BOOTH #4, 277 CANAL
ADJACENT H-3D, 421A BROADWAY, and
various JOHN AND JANE DOES and XYZ
COMPANIES (UNIDENTIFIED),

Defendants.

**ANSWER TO AMENDED
COMPLAINT**

(JURY TRIAL DEMANDED)

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Defendants, LIN LIN NAN, 265 CANAL BOOTH #16, XIANXIN CAI, JOEY'S GIFT SHOP, INC., CAI LIAN XIAO, LIAN FAR GIFT SHOP, CHENG CHEN and CHEN STAR GIFT SHOP, by their attorneys, Kevin Kerveng Tung, P.C., for their Answer to the Amended Complaint, respectfully allege as follows:

1. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "1" of the complaint.
2. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "2" of the complaint.
3. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "3" of the complaint.
4. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "4" of the complaint.
5. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "5" of the complaint.
6. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "6" of the complaint.
7. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "7" of the complaint.
8. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "8" of the complaint.
9. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "9" of the complaint.
10. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "10" of the complaint.

11. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “11” of the complaint.

12. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “12” of the complaint.

13. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “13” of the complaint.

14. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “14” of the complaint.

15. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “15” of the complaint.

16. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “16” of the complaint.

17. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “17” of the complaint.

18. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “18” of the complaint.

19. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “19” of the complaint.

20. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “20” of the complaint, except admit that LIN LIN NAN is an individual having a place of business at 265 Canal Street #16, New York, NY 10013.

21. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “21” of the complaint.

22. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “22” of the complaint.

23. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “23” of the complaint.

24. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “24” of the complaint.

25. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “25” of the complaint.

26. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “26” of the complaint.

27. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “27” of the complaint.

28. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “28” of the complaint.

29. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “29” of the complaint.

30. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “30” of the complaint.

31. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “31” of the complaint.

32. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “32” of the complaint, except admit that CHENG CHEN is an individual residing at 540 Central Avenue, Unit 28, Harrison, NJ 07029-1221, and having a place of business at Booth 12, 265 Canal Street, New York, NY 10013.

33. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “33” of the complaint, except admit that XIANXIN CAI is an individual having a place of business at Booth 9A, 265 Canal Street, New York, NY 10013.

34. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “34” of the complaint.

35. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “35” of the complaint.

36. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “36” of the complaint.

37. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “37” of the complaint.

38. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “38” of the complaint.

39. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “39” of the complaint.

40. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “40” of the complaint.

41. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “41” of the complaint.

42. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “42” of the complaint, except admit that CAI LIAN XIAO is an individual having a place of business at Booth 5, 265 Canal Street, New York, NY 10013.

43. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “43” of the complaint.

44. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “44” of the complaint.

45. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “45” of the complaint.

46. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “46” of the complaint.

47. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “47” of the complaint, except admit that CHEN STAR GIFT SHOP is an entity having a place of business at Booth 12, 265 Canal Street, New York, NY 10013.

48. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “48” of the complaint, except admit that JOEY’S GIFT SHOP, INC. is a corporation organized and existing under the laws of the State of New York, having a registered address of Booth 9A, 265 Canal Street, New York, NY 10013, and a place of business at Booth 9A, 265 Canal Street, New York, NY 10013.

49. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “49” of the complaint.

50. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “50” of the complaint.

51. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “51” of the complaint.

52. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “52” of the complaint.

53. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “53” of the complaint.

54. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “54” of the complaint, except admit that 265 CANAL BOOTH #16 is an entity having a place of business at Booth 16, 265 Canal Street, New York, NY 10013.

55. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “55” of the complaint, except admit that LIAN FAR GIFT SHOP is an entity having a place of business at Booth 5, 265 Canal Street, New York, NY 10013.

56. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “56” of the complaint.

57. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “57” of the complaint.

58. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “58” of the complaint.

59. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “59” of the complaint.

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61. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “61” of the complaint.

62. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “62” of the complaint and respectfully refer the court to the statute cited for a complete and accurate statement of its contents.

63. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “63” of the complaint and respectfully refer the court to the statute cited for a complete and accurate statement of its contents.

64. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “64” of the complaint.

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68. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “68” of the complaint.

69. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “69” of the complaint.

70. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “70” of the complaint.

71. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “71” of the complaint.

72. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “72” of the complaint.

73. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “73” of the complaint.

74. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “74” of the complaint.

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78. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “78” of the complaint.

79. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “79” of the complaint.

80. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “80” of the complaint.

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88. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “88” of the complaint.

89. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “89” of the complaint.

90. Deny the truth of the allegations contained in paragraph “90” of the complaint.

91. Deny the truth of the allegations contained in paragraph “91” of the complaint.

92. Deny the truth of the allegations contained in paragraph “92” of the complaint.

93. Deny the truth of the allegations contained in paragraph “93” of the complaint.

94. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “94” of the complaint.

95. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “95” of the complaint.

96. Deny the truth of the allegations contained in paragraph “96” of the complaint.

97. Deny the truth of the allegations contained in paragraph “97” of the complaint.

98. Deny the truth of each and every allegations contained in paragraph “98” of the complaint, except as otherwise pleaded herein.

99. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “99” of the complaint.

100. Deny the truth of the allegations contained in paragraph “100” of the complaint.

101. Deny the truth of the allegations contained in paragraph “101” of the complaint.

102. Deny the truth of the allegations contained in paragraph “102” of the complaint.

103. Deny the truth of each and every allegations contained in paragraph “103” of the complaint, except as otherwise pleaded herein.

104. Deny the truth of the allegations contained in paragraph “104” of the complaint.

105. Deny the truth of the allegations contained in paragraph “105” of the complaint.

106. Deny the truth of the allegations contained in paragraph “106” of the complaint.

107. Deny the truth of the allegations contained in paragraph “107” of the complaint and respectfully refer the court to the statute cited for a complete and accurate statement of its contents.

108. Deny the truth of the allegations contained in paragraph “108” of the complaint.

109. Deny the truth of each and every allegations contained in paragraph “109” of the complaint, except as otherwise pleaded herein.

110. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “110” of the complaint and respectfully refer the court to the statute cited for a complete and accurate statement of its contents.

111. Deny the truth of the allegations contained in paragraph “111” of the complaint.

112. Deny the truth of the allegations contained in paragraph “112” of the complaint.

113. Deny the truth of the allegations contained in paragraph “113” of the complaint and respectfully refer the court to the statute cited for a complete and accurate statement of its contents.

114. Deny the truth of the allegations contained in paragraph “114” of the complaint.

115. Deny the truth of each and every allegations contained in paragraph “115” of the complaint, except as otherwise pleaded herein.

116. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “116” of the complaint.

117. Deny the truth of the allegations contained in paragraph “117” of the complaint.

118. Deny the truth of the allegations contained in paragraph “118” of the complaint.

119. Deny the truth of the allegations contained in paragraph “119” of the complaint.

120. Deny the truth of the allegations contained in paragraph “120” of the complaint.

121. Deny the truth of each and every allegations contained in paragraph “121” of the complaint, except as otherwise pleaded herein.

122. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “122” of the complaint and respectfully refer the court to the statute cited for a complete and accurate statement of its contents.

123. Deny the truth of the allegations contained in paragraph “123” of the complaint.

124. Deny the truth of the allegations contained in paragraph “124” of the complaint.

125. Deny the truth of the allegations contained in paragraph “125” of the complaint.

126. Deny the truth of the allegations contained in paragraph “126” of the complaint.

127. Deny the truth of each and every allegations contained in paragraph “127” of the complaint, except as otherwise pleaded herein.

128. Deny the truth of the allegations contained in paragraph “128” of the complaint and respectfully refer the court to the statute cited for a complete and accurate statement of its contents.

129. Deny the truth of the allegations contained in paragraph “129” of the complaint.

130. Deny the truth of each and every allegations contained in paragraph “130” of the complaint, except as otherwise pleaded herein.

131. Deny the truth of the allegations contained in paragraph “131” of the complaint.

132. Deny the truth of the allegations contained in paragraph “132” of the complaint.

133. Deny the truth of the allegations contained in paragraph “133” of the complaint.

134. Deny the truth of the allegations contained in paragraph “134” of the complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

**THE ANSWARING DEFENDANTS LIN LIN NAN, 265 CANAL BOOTH #16,
XIANXIN CAI, JOEY'S GIFT SHOP, INC., CAI LIAN XIAO, LIAN FAR GIFT
SHOP, CHENG CHEN and CHEN STAR GIFT SHOP ALLEGE:**

135. Plaintiffs' complaint failed to state a cause of action against the answering defendants, LIN LIN NAN, 265 CANAL BOOTH #16, XIANXIN CAI, JOEY'S GIFT SHOP, INC., CAI LIAN XIAO, LIAN FAR GIFT SHOP, CHENG CHEN and CHEN STAR GIFT SHOP.

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE
THE ANSWARING DEFENDANTS LIN LIN NAN, 265 CANAL BOOTH #16,
XIANXIN CAI, JOEY'S GIFT SHOP, INC., CAI LIAN XIAO, LIAN FAR GIFT
SHOP, CHENG CHEN and CHEN STAR GIFT SHOP ALLEGE:**

136. Plaintiffs' marks and the goodwill of the business associated with them are not distinctive.

**AS AND FOR A THIRD AFFIRMATIVE DEFENSE
THE ANSWARING DEFENDANTS LIN LIN NAN, 265 CANAL BOOTH #16,
XIANXIN CAI, JOEY'S GIFT SHOP, INC., CAI LIAN XIAO, LIAN FAR GIFT
SHOP, CHENG CHEN and CHEN STAR GIFT SHOP ALLEGE:**

137. Defendants do not have the knowledge of Plaintiffs' marks.

**AS AND FOR A FOURTH AFFIRMATIVE DEFENSE
THE ANSWARING DEFENDANTS LIN LIN NAN, 265 CANAL BOOTH #16,
XIANXIN CAI, JOEY'S GIFT SHOP, INC., CAI LIAN XIAO, LIAN FAR GIFT
SHOP, CHENG CHEN and CHEN STAR GIFT SHOP ALLEGE:**

138. Defendants never intended to use the alleged similarity between Plaintiffs' and their products to cause confusion, or to cause mistake, or to deceive.

**AS AND FOR A FIFTH AFFIRMATIVE DEFENSE
THE ANSWARING DEFENDANTS LIN LIN NAN, 265 CANAL BOOTH #16,
XIANXIN CAI, JOEY'S GIFT SHOP, INC., CAI LIAN XIAO, LIAN FAR GIFT
SHOP, CHENG CHEN and CHEN STAR GIFT SHOP ALLEGE:**

139. Defendants' products are not likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of Defendants with Plaintiffs.

**AS AND FOR A SIXTH AFFIRMATIVE DEFENSE
THE ANSWARING DEFENDANTS LIN LIN NAN, 265 CANAL BOOTH #16,
XIANXIN CAI, JOEY'S GIFT SHOP, INC., CAI LIAN XIAO, LIAN FAR GIFT
SHOP, CHENG CHEN and CHEN STAR GIFT SHOP ALLEGE:**

140. Defendants' conducts are fair use of Plaintiffs' marks, which are not actionable.

**AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE
THE ANSWERING DEFENDANTS LIN LIN NAN, 265 CANAL BOOTH #16,
XIANXIN CAI, JOEY'S GIFT SHOP, INC., CAI LIAN XIAO, LIAN FAR GIFT
SHOP, CHENG CHEN and CHEN STAR GIFT SHOP ALLEGE:**

141. Plaintiffs suffered no damage or injury from Defendants' conducts.

WHEREFORE, the answering defendants, LIN LIN NAN, 265 CANAL BOOTH #16, XIANXIN CAI, JOEY'S GIFT SHOP, INC., CAI LIAN XIAO, LIAN FAR GIFT SHOP, CHENG CHEN and CHEN STAR GIFT SHOP, respectfully request a judgment

- a. dismissing the complaint against LIN LIN NAN, 265 CANAL BOOTH #16, XIANXIN CAI, JOEY'S GIFT SHOP, INC., CAI LIAN XIAO, LIAN FAR GIFT SHOP, CHENG CHEN and CHEN STAR GIFT SHOP;
- b. denying all the relieves sought therein against LIN LIN NAN, 265 CANAL BOOTH #16, XIANXIN CAI, JOEY'S GIFT SHOP, INC., CAI LIAN XIAO, LIAN FAR GIFT SHOP, CHENG CHEN and CHEN STAR GIFT SHOP, together with reasonable attorney fees and costs as such other and further relief as the Court deems just and proper.

DEMAND FOR JURY

Defendants hereby demand a jury as to any issue so triable.

Dated: September 25, 2007
New York, New York

Respectfully submitted,

KEVIN KERVENG TUNG, P.C.

By: /s/ Kevin K. Tung
Kevin K. Tung (KT 1478)
Kevin Kerveng Tung, P.C.
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Flushing, New York 11354
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Attorneys for Defendants
LIN LIN NAN
265 CANAL BOOTH #16
XIANXIN CAI
JOEY'S GIFT SHOP, INC.
CAI LIAN XIAO
LIAN FAR GIFT SHOP
CHENG CHEN
CHEN STAR GIFT SHOP

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Telephone: (212)801-9200
Facsimile: (212)801-6400

Attn: Harley I. Lewin, Esq.
Scott Gelin, Esq.
James Donoian, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of September, 2007, I electronically filed the forgoing with the Clerk of the Court using the CM/ECF system, which will send notification and delivery of such filing to registered participants for the litigation in which this document has been filed.

KEVIN KERVENG TUNG, P.C.
Attorneys for Defendants
LIN LIN NAN
265 CANAL BOOTH #16
XIANXIN CAI
JOEY'S GIFT SHOP, INC.
CAI LIAN XIAO
LIAN FAR GIFT SHOP
CHENG CHEN
CHEN STAR GIFT SHOP

By: /s/ Kevin K. Tung
Kevin K. Tung (KT 1478)
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